

**PRIVACY POLICY / Partner register**

General Data Protection Regulation (679/2016), art. 12

|                              |
|------------------------------|
| Last updated on<br>21.5.2018 |
|------------------------------|

|  |   |
|--|---|
| <b>1 Controller</b>  | Name<br>Sulava Oy   |
|  | Address<br>Vuorikatu 14 B, 00100 Helsinki   |
|  | Other contact information (for example, telephone number during office hours, e-mail address)<br>Vuorikatu 14 B, 00100 Helsinki   |
| <b>2 Contact person in matters concerning the register</b> | Name<br>Aki Antman  |
|  | Address<br>Mikonkatu 19   |
|  | Other contact information (for example telephone during office hours, email address)<br><a href="mailto:tietosuoja@sulava.com">tietosuoja@sulava.com</a> , 09-85668344  |
| <b>3 Name of the register</b>                              | Partner register  |
| <b>4 Purpose for processing personal data</b>              | <p>Personal data stored in the partner register are processed for the following purposes:</p> <ul style="list-style-type: none"> <li>• Maintaining and taking care of partnership</li> <li>• Processing of orders, invoicing and monitoring of payments</li> <li>• Managing and erasing duplicated information</li> <li>• Managing validity of the information</li> </ul> <p>The personal data is not processed by means of automated decision-making.<br/>The controller processes personal data on its own and uses subcontractors for processing personal data on behalf of the controller.</p>                            |
| <b>5 Information content of the register</b>               | <p>The register contains the following personal data considered appropriate regarding each data subject:</p> <ul style="list-style-type: none"> <li>- Identification details and contact information of the controller's contact persons, such as name, (personal identification number only for accountant), work address, work telephone number and work e-mail address.</li> <li>- If a data subject is a representative of a company or other entity, the identifying information and contact details of the company or other entity, such as name, business ID, address, telephone number and e-mail address.</li> </ul> |
| <b>6 Regular sources of data</b>                           | Personal data are collected from data subjects based on the notifications made by data subjects by phone, internet, email or other by other means.  |
| <b>7 Recipients of data</b>                                | Data from the register is, where necessary, disclosed to other companies of the same group for executing measures regarding offering and producing goods or services of the controller or other related usual reasons.  |
| <b>8 Transfer of data outside the EU or the EEA</b>        | The data from the register is mainly not transferred outside of the EU or the EEA. Possible transfers are conducted in accordance with the appropriate safeguards for data protection contained in the legislation and the GDPR.  |
| <b>9 Storage period for personal data</b>                  | Personal data in the register are stored only as long as and to the extent as it is necessary in relation to original or compatible purposes for which the personal data were collected. Personal data stated in this privacy policy are stored as long as the controller uses the data for the purposes described in section 4. Personal data in this register are erased when there is no longer a legitimate basis for their processing.   |
| <b>10 Principles for protecting the register</b>           | Data security of the register and confidentiality, integrity and availability of personal data are ensured with appropriate technical and organizational measures. The data in digital form are stored in cloud service and are protected with up-to-date data security software and verifications, as well as personal username and password that grant the rights to use the register. Possible paper versions of the data are kept in a locked room/locked premises and they are available only for the persons who have a right to access such data.  |
| <b>11</b>  | The data subject has the right to inspect what data concerning him or her is stored in the register. The request for access or a request for rectification can also be made by submitting a request to the register's contact person.   |

|   |   |
|---|---|
| <b>Right of access and right to rectification</b>                     |   |
| <b>12<br/>Right to erasure of data</b>                                | <p>The data subject has the right to obtain from the controller the erasure of personal data concerning him or her without undue delay, where</p> <ul style="list-style-type: none"> <li>• the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;</li> <li>• the data subject withdraws consent on which the processing is based and where there is no other legal ground for the processing;</li> <li>• the personal data have been unlawfully processed; or</li> <li>• the personal data have to be erased for compliance with a legal obligation in Union or Member State law.</li> </ul> |
| <b>13<br/>Right to restriction of processing</b>                      | <p>The data subject has the right to obtain from the controller restriction of processing if</p> <ul style="list-style-type: none"> <li>• the accuracy of the personal data is contested by the data subject;</li> <li>• the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;</li> <li>• the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claim.</li> </ul>  |
| <b>14<br/>Right to withdraw consent</b>                               | <p>The data subject has the right to withdraw his or her consent for processing at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.</p>  |
| <b>15<br/>Right to data portability</b>                               | <p>The data subject has the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller.</p>   |
| <b>16<br/>Right to lodge a complaint with a supervisory authority</b> | <p>The data subject has the right to lodge a complaint with a supervisory authority if the data subject considers that the processing of personal data relating to him or her infringes the applicable data protection legislation.</p>   |